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10 Attorneys for Defendant,  
11 FORD MOTOR COMPANY

12 **UNITED STATES DISTRICT COURT**  
13 **NORTHERN DISTRICT OF CALIFORNIA**

14 JUSTIN MOLLER and LUOFEI  
15 LIANG,

16 Plaintiffs,

17 v.

18 FORD MOTOR COMPANY; and  
DOES 1 through 10, inclusive

19 Defendants.  
20

Case No. 4:22-cv-05489-KAW

**JOINT STIPULATION  
REGARDING PLAINTIFFS' FEES,  
COSTS AND EXPENSES AND  
REQUEST FOR ENTRY OF ORDER**

21  
22 **TO THE HONORABLE COURT AND ALL PARTIES AND THEIR**  
23 **ATTORNEYS OF RECORD:**

24 This Stipulation is entered into by and between Plaintiffs JUSTIN MOLLER  
25 and LUOFEI LIANG ("Plaintiffs") and Defendant, FORD MOTOR COMPANY  
26 ("Defendant"), through their respective counsel of record.  
27  
28

WHEREAS, Plaintiffs JUSTIN MOLLER and LUOFEI LIANG accepted Defendant FORD MOTOR COMPANY's Offer of Judgment Pursuant to Fed. R. Civ. P. 68 March 11, 2024.

WHEREAS, the counsel for the parties have met and conferred and have reached an agreement, in lieu of Plaintiffs' counsel filing their Motion for Attorneys' Fees, Costs, and Expenses, Defendant FORD MOTOR COMPANY, is to pay fees, costs, and expenses in this matter for the sum of \$59,000.00. Such funding shall be satisfied by September 23, 2024. After satisfaction of payment, Plaintiffs will dismiss this case with prejudice within 10 business days against all parties.

Parties hereby apply for the entry of Order in the amount of \$59,000.00 for Plaintiffs' Attorneys' Fees, Costs, and Expenses as outlined in this Stipulation.

**IT IS SO STIPULATED.**

Dated: July 23, 2024

**STRATEGIC LEGAL PRACTICES,  
APC**

/s/ Tionna Carvalho

Tionna Carvalho  
Attorney for Plaintiff  
JUSTIN MOLLER and LUOFEI LIANG

Dated: July 23, 2024

**GORDON REES SCULLY  
MANSUKHANI, LLP**

/s/ Katherine Vilchez

Katherine Vilchez  
Attorney for Defendant  
FORD MOTOR COMPANY

All signatories listed, and on whose behalf this filing is submitted, attest to their electronic signatures and concur and authorize consent to the filing of this instant stipulation regarding Plaintiffs' attorneys' fees, costs, and expenses.